

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

LEN STOLER, INC. d/b/a LEN STOLER)	
AUDI,)	
)	
Plaintiff,)	
)	Case No. 1:15-cv-1659-TSE/JFA
v.)	
)	
VOLKSWAGEN GROUP OF AMERICA, INC.)	
d/b/a AUDI OF AMERICA, INC.,)	
)	
Defendant.)	

DEFENDANT AUDI OF AMERICA, INC.’S AMENDED WITNESS LIST

Pursuant to Fed. R. Civ. P. 26(a)(3) and the Court’s Scheduling Order dated May 16, 2016 (Dkt. No. 21) Defendant Audi of America, Inc. (“AoA”) hereby lists the witnesses it expects to call at trial, those it may present if the need arises, and those whose testimony it expects to present by deposition. AoA reserves the right to call a witness not listed, solely for impeachment or rebuttal, or in the event of unfair surprise. This document is an amendment to AoA’s previously filed witness list. (Dkt. No. 121.)

Witnesses AoA Expects to Call

1. Cody Thacker
2. Paul Ritsema
3. Mark Balmer
4. Reinhard Fischer
5. David Smith
6. Jay Lytle
7. Mark Schmitz

8. Barry Stoler
9. Leonard Stoler
10. David Leibowitz

Witnesses AoA May Call if the Need Arises

11. Kyle Mathews
12. Peter Hamilton
13. Jeremy Meyer
14. Fred Galata
15. Joseph Roesner
16. Todd Berko

In addition to the witnesses listed above, AoA reserves the right to call any and all witnesses called by Plaintiff.

Witnesses Whose Testimony AoA Expects to Present by Deposition

AoA has designated portions of testimony of corporate officers Len Stoler, Barry Stoler, and David Leibowitz. Designations will be provided to opposing counsel at or before the final pretrial.

Dated: March 17, 2017

Respectfully submitted,

/s/ _____
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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of March, 2017, I served a true and accurate copy of the foregoing by filing it electronically with the Clerk of the Court using CM/ECF system, which will send a notification of such filing (NEF) to the following:

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